



19

Manager, Dissemination Branch
Information Management and Services Division
Office of the Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Att: 8045

Dear Sir or Madam:

I am writing in response to the request for comments with proposed changes to the Thrift Financial report effective March 31, 2001, published in the Federal Register August 4, 2000. Specially my comments are directed to the additional Schedule HC - Thrift Holding Company and on Schedule SI transactions with affiliates.

First, it is important to realize that information required to complete the Schedule HC - Thrift Holding Company is part of the information required to file the 10Q (Quarterly Report Pursuant to Section 13 or 15 (d) of the Securities and Exchange Act 1934), and the 10K (Annual Report Pursuant to Section 13 or 15 (d) of the Securities and Exchange Act of 1934). These reports are not filed until 45 days after the end of the quarter in case of the 10Q and 90 days after the end of the quarter in case of the 10K.

In fairness to all institutions one must realize that in most cases the information required to file Schedule HC, (which is due 30 days after quarter end), might not be available, or it might be subject to changes when it is required to be included in the TFR. It is important to emphasize that the information required to file the Schedule HC is publicly undisclosed information at the time the TFR is filed.

All things consider, if the Schedule HC - Thrift Holding Company and the Schedule SI Transaction with affiliates is added to the information submitted to the OTS, this information should be remitted as part of CMR schedules. That will give the filing institutions the additional time for more accurate information to be available and align the reporting deadlines with the 10Q.

In conclusion if this information will be required in future reporting, the due date of the reporting should be carefully examined; making the reporting more feasible to all institutions.

Sincerely yours

Robert Diaz
VP, Assistant Controller

Marka Hiott
Financial Reporting